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## Roberts v. Randy L L Corp

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Ted Roe <tedr@veritasbusinesslaw.com>

Thu, Sep 12, 2024 at 7:34 PM

To: JESSICA MOLLIGAN <jessicamolligan@comcast.net>

Ms. Molligan:

The deadline for Plaintiff's responses to Defendant's second and third RFPs, Interrogatories and requests for admission have passed with no response to the interrogatories, second or third RFPs or RFA. As a result the you have waived any and all objections related to the second and third RFPs and RFA and RFAs are deemed admitted. Further, you have waived any and all objections to the interrogatories.

Further, if the responses for Defendant's interrogatories are not served on me by email on or before September 13, 2024 by 12:00pm PST, we will file a motion to compel and in addition to seeking an order compelling a response to the interrogatories, we will seek sanctions, including but not limited to costs and attorney fees, as well as including but not limited to baring Plaintiff from presenting evidence related to the interrogatories, an order deeming facts admitted in the unresponded interrogatories, and an order striking Plaintiff's pleadings and/or entering a default against Plaintiff. If these responses are not received by the date and time indicated above, I will call you to confer prior to filing a motion to compel.

Additionally, if the documents requested by Defendant's second and third RFPs are not served on me by email on or before September 13, 2024 by 12:00pm PST, we will file a motion to compel and in addition to seeking an order compelling such documents, we will seek sanctions, including but not limited to costs and attorney fees, as well as including but not limited to baring Plaintiff from presenting evidence related to the requests and an order striking Plaintiff's pleadings and/or entering a default against Plaintiff. If these documents are not received by the date and time indicated above, I will call you to confer prior to filing a motion to compel.

I also want to remind you that you have produced no documents whatsoever related to Defendant's first requests for production, nor have you amended your bad faith objections to Defendant's first RFP.

Ted Roe

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